### Case 1:13-cr-00268-JMF Document 1289 Filed 01/27/16 Page 1 of 3

## Walden Macht & Haran LLP



January 27, 2016

Hon. Jesse M. Furman United States District Court Southern District of New York 40 Foley Square, Room 2202 New York, N.Y. 10007

Re: U.S. v. Alimzhan Tokhtakhounov, et al., 13 Cr. 268 (JMF)

Dear Judge Furman:

I am the attorney for Molly Bloom, a defendant in the above-referenced case.

On September 18, 2015, Ms. Bloom successfully completed the term of probation imposed by Your Honor based on her guilty plea to illegal gambling. Attached is a Notice of Discharge from the U.S. Probation Office for the Southern District of New York.

I have been informed that the U.S. Pretrial Services Agency in the Southern District of New York (PTS) had possession of Ms. Bloom's passport during most of the pendency of her criminal case. However, for reasons that remain unclear, PTS sent the passport to the U.S. Department of State (DOS) on August 15, 2014, without notifying me or the Assistant U.S. Attorney in charge of Ms. Bloom's case.

Although I will endeavor to locate the current holder of the passport (no one at the DOS answers the telephone number provided by PTS, and there is no voicemail for the number), my prior experience informs that a Court order will be required. Because Ms. Bloom needs to travel to London in February for business, she may need to apply for a replacement passport on an expedited basis if I cannot locate her original passport.

Thus, I respectfully request (a) that Your Honor order PTS to reacquire and return Ms. Bloom's passport; and (b) if PTS cannot do so by February 5, 2016, that Ms. Bloom be permitted to apply for a replacement passport.

# Case 1:13-cr-00268-JMF Document 1289 Filed 01/27/16 Page 2 of 3

I have spoken with AUSA Joshua Nat	stalis, who consents to this request.
Thank you.	
	Respectfully submitted,
So Ordered:	Jim Walden
Jesse M. Furman United States District Judge	

### U.S. DISTRICT COURT OF THE SOUTHERN DISTRICT OF NEW YORK



#### U.S. PROBATION OFFICE 500 PEARL STREET, 6TH FLOOR NEW YORK, NY 10007-1312 (212) 805-0040

### NOTICE OF DISCHARGE

Name: Molly Bloom

Offense & Statue: ILLEGAL GAMBLING - 18:1955.F

Class C Felony

Pacts: 66311

Register Number: 64654-112

Case Number: 13-CR-268-31

Date sentence imposed: May 02, 2014

Date sentence expired: September 18, 2015

Inasmuch as you have completed your term of Probation on the date shown above, you are hereby discharged from supervision.

Enid Febus

Supervisory U.S. Probation Officer

September 18, 2015

Date